Ohio Environmental Protection Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

April 2, 2020

Limited Environmental Review and Finding of No Significant Impact

City of Columbus – Franklin County
Lockbourne Subtrunk Air Quality Improvements
Loan number: CS390274-0213

The attached Limited Environmental Review (LER) is for the installation of air quality systems along the Lockbourne Intermodal Subtrunk (LIS) alignment in Columbus which the Ohio Environmental Protection Agency intends to finance through its Water Pollution Control Loan Fund (WPCLF) below-market interest rate revolving loan program. The LER describes the project, its costs, and expected environmental benefits. Making available this LER fulfills Ohio EPA's environmental review and public notice requirements for this loan program.

Ohio EPA analyzes environmental effects of proposed projects as part of its WPCLF program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. This project's relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment. More information can be obtained by calling or writing the person named at the end of the attached LER.

Upon issuance of this Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

E-SIGNED by Jonathan Bernstein
on 2020-04-03 08:29:12 EDT

Jonathan Bernstein, Assistant Chief
Division of Environmental and Financial Assistance

Attachment

LIMITED ENVIRONMENTAL REVIEW

Project Identification

Name: Columbus – Lockbourne Subtrunk Air Quality Improvements

Applicant: Tracie Davies, Utilities Director
City of Columbus
910 Dublin Road
Columbus, OH 43215

Loan Number: CS390274-0213

Project Summary

The City of Columbus in Franklin County has requested $3,547,000 from the Water Pollution Control Loan Fund (WPCLF) to install two active air quality systems along the Lockbourne intermodal subtrunk alignment to treat and reduce the risk of hydrogen sulfide odor releases and corrosion.

History and Existing Conditions

Columbus is expanding its sanitary sewer collection system with the construction of the Lockbourne Intermodal Subtrunk (LIS) to serve future development in the Northern Pickaway County Joint Economic Development District. To ensure air quality is not negatively impacted, Columbus has elected to install odor control facilities. The city chose to install biofilter facilities to standardize operations with existing odor control facilities operating in the collection system currently.

Project Description

Columbus will be constructing two new air quality facilities for a new sanitary main, Lockbourne Intermodal Subtrunk (LIS), to provide improved air quality for the region and aid in the reduction of system corrosion by treating hydrogen sulfide. The improvements will include construction of media beds, controls, and instrumentation. The project area encompasses two shaft site locations along the LIS sewer alignment. These include Site 1 at 548 Rowe Road and Site 2 located at the intersection of Lockbourne Road and Ashville Pike.

Based on the results of the preliminary ventilation and odor control study, it was recommended that a 5,000 cubic feet per minute (CFM) biofilter facility be constructed along Rowe Road and a 3,000 CFM biofilter facility be constructed along Ashville Pike, but the city has elected to utilize identical 5,000 CFM biofilters at each site to improve the efficiency of the design effort and provide operational consistency. The foul air system at each biofilter facility will consist of a duct system and fan to draw foul air from the LIS and convey/distribute it to the biofilter media. The fan will be housed in a weatherproof building along with the electrical and control equipment. The biofilter cell at each facility will consist of an air plenum floor system, dual layered media, and irrigation system to remove organic and inorganic constituents from the extracted sewer tunnel air. A chain link fence will also be installed to provide security for the biofilter facilities. An example of the completed facility can be seen in Exhibit 1 below.

The construction footprint for this project will remain within the previously disturbed area along

roadways, therefore minimizing effects on environmental resources. The contractor is responsible for best management practices to control dust, erosion, and sedimentation. Stormwater best management practices such as grass pavers will be utilized whenever possible. Traffic impacts should be minimal and will be coordinated with Paving the Way.

The site along Rowe Road is located in a special flood hazard area and will be subjected to the city or county floodplain regulations, permits, fees, and inspections as appropriate. The special flood hazard area is an area where the Base Flood Elevation (BFE) has been determined at an elevation of 697 feet and is subject to a 100-year flooding event. Therefore, floodplain modification will be necessary, including placing fill within the floodplain until the elevation site is above the 100-year BFE. The fan building will have its finished floor raised to an elevation of 699 feet (2 feet above the BFE), and the top of the biofilter cell walls will be set to a minimum elevation of 699 feet to prevent flooding of the biofilter cells.

Maps of the project location are provided in Exhibits 2-4 below.

Implementation

Project Costs
Columbus plans to borrow $3,547,,000 from the WPCLF. During the 20-year loan period Columbus will save approximately $501,389 by using WPCLF dollars at the Standard Long-Term rate of 0.98%, compared to the market rate of 2.23%.

Local Economy
The current Columbus residential sewer bill associated with this system is approximately $1,015/year. Projected residential sewer bills with the implementation of this and other associated projects are expected to increase to approximately $1,280/year, which is approximately 2.5% of $49,478, the median household income (MHI) of Columbus.

By using WPCLF financing for this project, Columbus has minimized the economic impact on customers.

Project Schedule
The anticipated loan award will occur in April 2020. Construction is expected to begin soon after and is expected to be complete by January 2021.

Public Participation

A public notice was posted on the City of Columbus' Public Utilities webpage detailing the proposed location and construction impacts of two new air quality facilities to provide improved air quality for the region and aid in the reduction of system corrosion. Contact information was provided for any public questions or concerns.

Reviews of the respective environmental resources were completed by Ohio EPA, Division of Environmental and Financial Assistance. The review agency does not oppose the project.

Ohio EPA will make a copy of this document available to the public on its web page: http://epa.ohio.gov/defa/ofa.aspx (Under the "What's New" tab, scroll to: "Documents Available for Review and Comment – WPCLF Documents for Review and Comment") and will provide it upon request to interested parties. Information supporting this Limited Environmental Review (LER) is available from the project contact named below.

Conclusion

The proposed project meets the project type criteria for an LER; namely, it is an action within an existing public wastewater collection system, which involves improvements to existing equipment. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

- *Has no significant environmental effect, no effect on high value environmental resources, and does not require extensive specific impact mitigation.*
  The project involves installing air quality facilities within the previously disturbed area along roadways, in areas lacking important environmental features. No stream crossings or in-wetland work is scheduled to occur, and there will be no construction within prime farmland. If necessary, tree clearing is to occur within seasonal clearing dates to protect endangered bat species located in the area. The contractor is responsible for dust control, sedimentation and erosion control, and maintenance of traffic during construction. One site will involve construction within the floodplain, but planning has occurred to modify the construction in this location so that structures will be raised above the Base Flood Elevation.

- *Is cost effective and not controversial.*
  The proposed project is cost-effective, as it involves constructing facilities which will prevent corrosion in the wastewater system, alleviating future maintenance and operation costs. Taking no action will result in decreased air quality for the region and lead to public health impacts. DEFA is unaware of any specific opposition to or controversy about this project that will improve the operation of the wastewater collection system and reduce the risk of hydrogen sulfide odor releases.

- *Does not create a new, or relocate an existing, discharge to surface or ground waters, and will not result in substantial increases in the volume of discharge or the loading of pollutants from an existing source or from new facilities to receiving waters; and will not provide capacity to serve a population substantially greater than the existing population.*
  This project involves construction of biofilter facilities along the planned sanitary main in the area. The project itself does not create or relocate a discharge to surface or ground waters, will not extend service into undeveloped areas, nor increase the volume of current wastewater discharges.

Based upon the available planning information for this project and the materials presented within this LER, Ohio EPA concludes that the proposed project will not result in any significant adverse impacts to any environmental features. The project is expected to have no significant short-term or long-term adverse impacts on the quality of the human environment or on sensitive resources such as surface waters, coastal zones, riparian areas, floodplains, wetlands, state-designated scenic or recreational rivers, prime or unique agricultural lands, aquifer recharge zones, archaeologically or historically significant sites, or threatened or endangered species.

This project will aid in the reduction of corrosion in the city's wastewater collection system and provide improved air quality to the region.

Contact

Kristin Parrish
Ohio EPA-DEFA

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Exhibit 1: Example of Air Quality Facility Once Complete

Exhibit 2: Project Location Map

Exhibit 3: Project Location Map

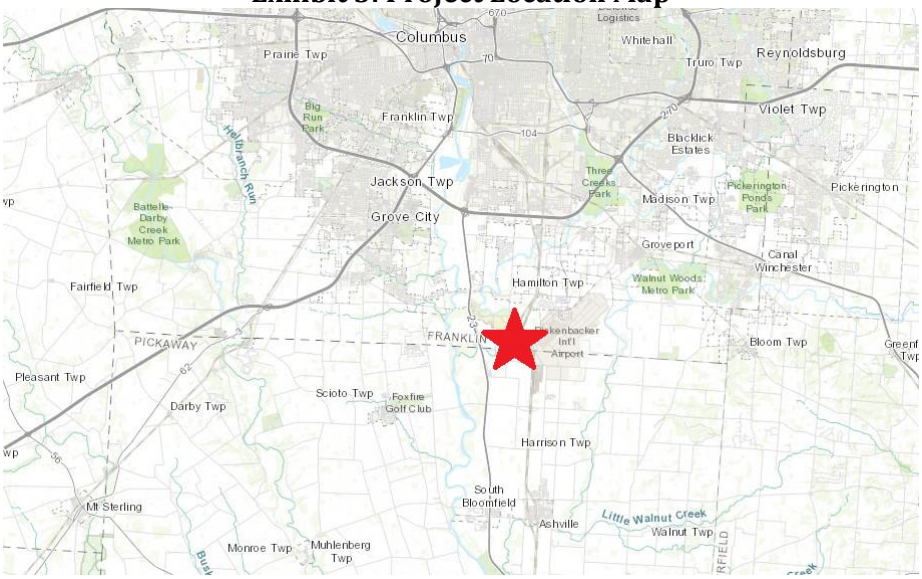

Exhibit 4: Project Location Map